

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Alexandria Division

2022 JUL -8 PM 3:47

Moses Ogango
43287 Thaddeus Ln
Leesburg VA 20176

Case No.

1:22CV752
(to be filled in by the Clerk's Office)
CMH/WEF

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☐ Yes ☒ No

VERIZON BUSINESS NETWORK SERVICES LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Moses Ogango
Street Address	43287 Thaddeus LN
City and County	Leesburg
State and Zip Code	VA
Telephone Number	703-489-4801
E-mail Address	mogango2005@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Defendant No. 1**Name** VERIZON**Job or Title** *(if known)***Street Address**

1 VERIZON WAY

City and County

BASKING RIDGE

State and Zip Code

NJ 07920

Telephone Number**E-mail Address** *(if known)***Defendant No. 2****Name****Job or Title** *(if known)***Street Address****City and County****State and Zip Code****Telephone Number****E-mail Address** *(if known)***Defendant No. 3****Name****Job or Title** *(if known)***Street Address****City and County****State and Zip Code****Telephone Number****E-mail Address** *(if known)***Defendant No. 4****Name****Job or Title** *(if known)***Street Address****City and County****State and Zip Code****Telephone Number****E-mail Address** *(if known)*

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	Verizon Business Services
Street Address	22001 Loudound County Parkway
City and County	Ashburn Loudoun
State and Zip Code	VA 20146
Telephone Number	

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Other federal law *(specify the federal law)*:

- ☐ Relevant state law *(specify, if known)*:

- ☐ Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☒ Failure to hire me.
- ☐ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☐ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☐ Other acts *(specify)*: _____

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
Between 2013 and 2020

C. I believe that defendant(s) *(check one)*:

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☐ race _____
 - ☐ color _____
 - ☐ gender/sex _____
 - ☐ religion _____
 - ☒ national origin (Retaliation based on my complaining to HR about how management treated me)
 - ☐ age *(year of birth)* _____ *(only when asserting a claim of age discrimination.)*
 - ☐ disability or perceived disability *(specify disability)* _____
-

E. The facts of my case are as follows. Attach additional pages if needed.

1. I started working for MCI in Feb 1999. MCI/Worldcom later got acquired by Verizon. My title was circuit Engineer II
2. I transfered to Bob Workman's group in around the Fall of 2000. Bob workman then hired Rohini Macmillan a few months later as circuit designer. Rohini got rapidly promoted and was made a team lead and then a manager
3. Rohini supervised me together with a few other Circuit Engineers
4. I made a complaint to HR about how Rohini was treating me (harassing) and I was put on a PIP shorlty thereafter. This was in Summer of 2006. I was then terminated in August 30 2006
5. I filed EEOC complaint and they investigated and found my termination was not regular - was illegal. Was retaliation.
6. EEOC mediated between me and Verizon and Verizon paid me and also signed a concilliation agreement
7. Part of the concilliation was that Verizon would not retaliate against me or any other employee in the future.
8. In 2013, I applied for another employment for Verizon and was rejected
9. I applied a few more times between 2013 and 2019 and kept getting rejections
10. After a rejection in summer of 2019, I wrote to company' chief counsel and they explicitly told me I was not eligible for rehire. The letter was dated October 2020. See attached.
11. I thought that explanation was a contravention of the original concilliation agreement, so I filed a second EEOC complaint in February of 2021.
12. EEOC conducted their investigations and gave me a letter to sue on April 11, 2022. See attached.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

February 10, 2021

- B. The Equal Employment Opportunity Commission (check one):

☐ has not issued a Notice of Right to Sue letter.

☒ issued a Notice of Right to Sue letter, which I received on (date) 4/11/2022.

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☐ 60 days or more have elapsed.

☐ less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Back pay \$10,000

Damages \$35,000

Punitive damages: \$300,000

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7/8/2022

Signature of Plaintiff



Printed Name of Plaintiff

Moses Ogango

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Street Address

State and Zip Code

Telephone Number

E-mail Address

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria DIVISION

FILED

2022 JUL -8 P 3:47

MOSES OGANGO

Plaintiff(s),

v.

Civil Action Number: 1:22CV 752
CMH/WEF

VERIZON

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of COMPLAINT FOR EMPLOYMENT
DISCRIMINATION.
(Title of Document)

MOSES OGANGO

Name of *Pro Se* Party (Print or Type)

Ogango

Signature of *Pro Se* Party

Executed on: 07/08/2022 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)